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Attorneys for Defendant  
MAKER'S MARK DISTILLERY, INC.,  
d b a. MAKER'S MARK

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

SAFORA NOWROUZI AND TRAVIS WILLIAMS, INDIVIDUALLY AND ON BEHALF OF ALL OTHERS SIMILARLY SITUATED.

## Plaintiffs,

MAKER'S MARK DISTI  
d.b.a. MAKER'S MARK.

Defendant.

**Case No. 3:14-cv-02885 JAH NLS**  
Pleading Type: Class Action

**DEFENDANT MAKER'S MARK  
DISTILLERY, INC.'S NOTICE OF  
MOTION AND MOTION TO  
DISMISS COMPLAINT**

Hearing Date: March 2, 2015  
Time: 2:30 p.m  
Courtroom: 13B  
Judge: Hon. John A. Houston  
  
Complaint Filed: December 5, 2014

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE THAT on March 2, 2015, at 2:30 p.m., or as soon  
3 thereafter as the matter may be heard, in Courtroom 13B of the above-entitled court,  
4 located at 221 West Broadway, San Diego, California, Defendant Maker's Mark  
5 Distillery, Inc., d/b/a. Maker's Mark ("Maker's Mark") will and hereby does move the  
6 Court to dismiss Plaintiffs Safora Nowrouzi and Travis Williams's Complaint (Dkt. 1)  
7 with prejudice pursuant to Rules 12(b)(6) of the Federal Rules of Civil Procedure.  
8 This Motion is made on the grounds that Plaintiffs cannot state a claim upon which  
9 relief can be granted.

10 This Motion is based on this Notice of Motion and Motion, the attached  
11 Memorandum of Points and Authorities and Request for Judicial Notice in support of  
12 the Motion filed concurrently herewith and Proposed Order filed herewith, the record  
13 in this action, and any evidence and argument that may be presented at or before the  
14 hearing.

15  
16 Dated: January 16, 2015

Respectfully submitted,

17  
18 WINSTON & STRAWN LLP

19 By: /s/ Amanda L. Groves

20 Amanda L. Groves  
21 Daniel D. Rubinstein  
22 Attorneys for Defendant  
23 MAKER'S MARK DISTILLERY, INC.,  
24 d.b.a. MAKER'S MARK